

Exhibit G

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)	
et al.,)	
)	
Plaintiffs,)	Civil Action
)	No. SA-21-CV-00844-XR
vs.)	
)	
GREGORY W. ABBOTT, et al.,)	
)	
Defendants.)	
)	

ORAL DEPOSITION OF

ALAN VERA

FEBRUARY 27, 2023

ORAL DEPOSITION OF ALAN VERA, produced as a witness at the instance of the Plaintiffs, and duly sworn, was taken in the above-styled and numbered cause on February 27, 2023, from 10:00 a.m. to 3:37 p.m., Nilda Codina, Notary in and for the State of Texas, recorded by machine shorthand, from Javier N. Maldonado & Associates, P.C., 1415 North Loop W., Suite 600, Houston, Texas, County of Harris pursuant to the Federal Rules of Civil Procedure, and the provisions stated on the record or attached hereto.

1 1 says can even inspect the ballot. That's not true
2 when the voter's being assisted by their own chosen
3 assistant.

4 Q. So how -- you know if a watcher asks you how
5 close can I be in order to perform that function and
6 you say being right there, how close is right there in
7 a numerical sense?

8 A. We are still referring to a voter being
9 assisted by an election worker, I've told the poll
10 watchers they can be right there at the polling booth
11 to be able to see every action made by the election
12 worker and hear every instruction given by the voter to
13 the election worker, close enough to see and hear.

14 Q. Okay. And how far is that in terms of
15 distance?

16 A. It depends how good the poll watchers vision
17 and hearing is.

18 Q. Okay. So let's say it's not great, but the
19 poll watcher still capable of seeing and hearing, if
20 the poll watcher says can I stand one foot from the
21 voter, would you say that's okay?

22 A. I would tell the vote poll watcher if you
23 need to stand one foot from the voter to see and hear
24 everything, yes. Do not make contact with the voter or
25 the election worker.

1 checks in.

2 So if the election worker, by shifting
3 his body to block the screen or making the table so
4 close to the wall the poll watcher can't stand there,
5 those are things that the election workers could do
6 that would prohibit the -- the poll watcher from being
7 able to see and hear all the transactions.

8 Q. Okay. Describe for me actions by a poll
9 worker that would distance the watcher from the
10 activity or procedure to be observed in a manner that
11 would make observation not reasonably effective with
12 respect to activities that involve the voter?

13 A. The most blatant example of that is an
14 election judge, the presiding judge of a polling place
15 telling the voter they cannot move any closer than this
16 distance.

17 Q. Or telling the watcher?

18 A. Right, telling the watcher they cannot be any
19 closer than this distance.

20 Q. Okay. So for example saying you can't get
21 closer than three feet to the poll worker assisting the
22 voter and casting the ballot?

23 A. Correct.

24 Q. Okay. Is it within the scope of what a poll
25 watcher can do to write down the names of voters as